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Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
)	
Plaintiff,)	DECLARATION OF OLIVIA
)	FLECHSIG IN SUPPORT OF
)	PARTIES' JOINT EX PARTE
vs.)	APPLICATION TO CONTINUE
)	THE OCTOBER 29, 2024 MOTION
)	HEARING DEADLINE AND
CHEVRON USA, INC., a California)	RELATED DATES
Corporation, and DOES 1 through)	
10, inclusive,)	
)	District Judge: Hon. Hernan D. Vera
)	Magistrate Judge: Hon. A. Joel Richlin
)	Action Filed: August 3, 2023
Defendants.)	Trial Date: February 4, 2025
)	
)	

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2 A Limited Liability Partnership
3 Including Professional Corporations
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DECLARATION OF OLIVIA FLECHSIG, ESQ.

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2 1. I am an attorney at law licensed to practice before all courts of the
3 State of California and am an Associate at the law firm of Allred, Maroko &
4 Goldberg, attorneys of record for Plaintiff Mark Snookal (“Mr. Snookal” or
5 “Plaintiff”). As such, I am familiar with the facts of this case. The following is true
6 of my own personal knowledge, except where it is stated on information and belief.
7 If called, I could and would competently testify thereto.

8 2. This declaration is submitted in support of Parties’ Joint Stipulation to
9 Continue the September 19, 2024 Expert Discovery Cut-Off and the October 29,
10 2024 Motion Hearing Deadline.

11 3. I anticipate the need to take expert witness depositions and engage in
12 document discovery related to Defendant Chevron USA, Inc.’s (“Chevron”) initial
13 expert disclosures. I am informed that Chevron may also need to take expert
14 witness depositions and engage in document discovery related to Plaintiff’s expert
15 disclosures. This is not something that Chevron and Mr. Snookal (collectively
16 “Parties”) could complete in the time allotted by the existing deadlines, because the
17 time between the Initial Expert Disclosures and the Expert Discovery Cut-Off is
18 fewer than 30 days.

19 4. On July 11, 2024, I caused Chevron’s counsel to be served with
20 Notices of Deposition for Andrew Powers (“Mr. Powers”), Dr. Eshiofe Asekomeh
21 (“Dr. Asekomeh”), Dr. Scott Levy (“Dr. Levy”), Gia Lott (“Ms. Lott”), and Thalia
22 Tse (“Ms. Tse”), in advance of the August 13, 2024 Fact Discovery Cut-Off.

23 5. Parties have been meeting and conferring to find mutually agreeable
24 dates for these depositions, but schedules have not yet allowed for the completion
25 of the depositions of Mr. Powers, Dr. Asekomeh, or Ms. Tse. For Plaintiff,
26 testimony of these witnesses is key information for use in opposition to Chevron’s
27 Motion for Summary Judgment. Attached hereto as **Exhibit A** is a true and correct
28 copy of Parties’ email meet and confer efforts to schedule said depositions.

1 6. On Thursday, August 22, 2024 at 10:42 pm Pacific Time, we received
2 an email from counsel for Chevron containing Chevron's Motion for Summary
3 Judgment. Chevron intended to have the hearing on its Motion for Summary
4 Judgment on October 24, 2024.

5 7. On October 24, 2024, both my colleague, Dolores Y. Leal, Esq. and I
6 have a trial scheduled in the matter of *Dayse Leonor Ordonez-Bass v. Roberto*
7 *Francisco Gallegos et al.* (Orange County Superior Court Case No. 30-2022-
8 01281599-CU-OE-NJC).

9 8. To date, both Parties have propounded and answered written
10 discovery requests; propounded and answered document discovery requests; and
11 have noticed and taken witness depositions.

12 9. Parties also participated in private mediation on June 25, 2024, though
13 settlement negotiations were not successful.

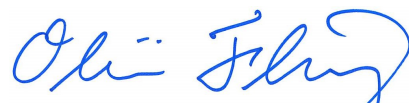
14 10. Parties have not requested any prior continuance in this case, and I am
15 informed that we agree that the continuances requested are not intended to disturb
16 the current trial or pretrial filing deadlines in this case.

17 11. On August 27, 2024, I met and conferred with Sarah Fan ("Ms. Fan"),
18 counsel for Defendant Chevron USA, Inc. via video conference regarding whether
19 they will stipulate to continuing Parties' existing Expert Discovery Cut-Off and
20 Motion Hearing Deadline. On August 29, 2024, Ms. Fan emailed me to confirm
21 Chevron's agreement to this effect.

22 I declare under penalty of perjury of the laws of the State of California that
23 the foregoing is true and correct.

24 Executed at Los Angeles, California on this 29th day of August, 2024.

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OLIVIA FLECHSIG, ESQ.